

# **EXHIBIT B**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

In re:

**Jeffrey David Corbett,<sup>1</sup> and  
Helen Christine Corbett.**

**Case No. 19-36309**

**Chapter 11**

**Judge Huennekens**

**NOTICE OF (A) FILING OF APPLICATION TO EMPLOY AND (B) HEARING  
ON MOTION IF NECESSARY (ONLY TO BE HELD IF OBJECTION TIMELY FILED)**

PLEASE TAKE NOTICE that the above captioned debtors and debtors-in-possession (the “**Debtors**”), by counsel, filed with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (the “**Court**”) an *Application to Retain and Employ Kutak Rock, LLP as Their Special Counsel* (the “**Application**”). A copy of the Application is being served upon you simultaneously herewith.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one). Under Local Bankruptcy Rule 9013-1, unless a written response to the Application is filed with the Clerk of Court and served on the moving party no later than April 30, 2020, the Court may deem any opposition waived, treat the Application as conceded, and issue an order granting the relief requested.**

If you do not want the Court to grant the relief sought in the Application, or if you want the Court to consider your views on the Application, then no later than April 30, 2020 you or your attorney must:

1. File with the Court, at the address shown below, a written response with supporting memorandum pursuant to Local Bankruptcy Rule 9013-1. You must send or otherwise

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<sup>1</sup> The Debtors’ principal place of business as of the petition date is 221 Roslyn Hills Drive, Henrico, Virginia 23229, and the last four digits of the Debtors’ Social-Security Numbers are -4102 and -6140.

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Lynn L. Tavenner, Esquire (Va. Bar No. 30083)  
Paula S. Beran, Esquire (Va. Bar No. 34679)  
David N. Tabakin, Esquire (Va. Bar No. 82709)  
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file it early enough so the Court will receive it on or before the due date identified herein.

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street, Suite 4000  
Richmond, Virginia 23219

2. You must also serve a copy on:

Paula S. Beran, Esquire  
Tavenner & Beran, PLC  
20 North Eighth Street, Second Floor  
Richmond, Virginia 23219

3. If you object to the Application, you must file the Objection timely and attend a hearing to be held on May 13, 2020, at 12:30 PM before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, of the United States Courthouse, 701 E. Broad Street Richmond, Virginia 23219.

If you or your attorney do not take these steps, the Court may deem any opposition waived, treat the Application as conceded, and issue an order granting the requested relief without further notice or hearing.

**Respectfully submitted,**

Dated: April 16, 2020

By: /s/ Paula S. Beran  
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*Counsel for the Debtors*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16th day of April 2020, a copy of the foregoing Notice was mailed by U.S. Mail, postage prepaid, or electronic mail to was served via first-class mail and/or electronic delivery to the Debtors' twenty largest unsecured creditors as identified in their chapter 11 petition, the Debtors' known secured creditors, any known legal counsel for the Debtors' secured creditors, the Subchapter V Trustee, and the Office of the United States Trustee ((as indicated on the Schedule A attached to the Court filed copy of this Notice).

/s/ Paula S. Beran  
Counsel

## SCHEDULE A

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